ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: April 16, 1986

TO: Land Division File

FROM: Richard Johnson, DLPC/FOS, Central Region

SUBJECT: LPC #1178020001 and 1178020003 - Macoupin County, Brighton/Brighton #1 and #2
ILD #000667139
FOS

An Interim Status Standards (ISS) Inspection of the Brighton Landfill was conducted April 16, 1986, by this writer. Accompanying me for part of the inspection were Jim Moore (DLPC/Permit Section) and Chris Liebman (DLPC/Permit Section). Representing Brighton Landfill during the inspection were Gene Evans (President of Com-Pak Engineering) and Doug Tickner (Facility Supervisor).

The landfill is composed of two areas that have been separately permitted for development and operation. Both sites have received hazardous waste for disposal. Since neither site has gone through an approved closure (in accordance to Subpart G of Part 725 regulations), both sites are considered to be active portions of the facility. The sites are contiguous and so they are regulated as one landfill. For the purpose of describing areas at the landfill, this memo will identify the major portions as Site 1 (LPC #1178020001) and Site 2 (LPC #1178020003).

The landfill (Site 1 and Site 2) apparently hasn't received hazardous waste since November 7, 1985. All land disposal facilities had to meet certain requirements pursuant to the Hazardous Solid Waste Amendments of 1984 by 11/8/85 or lose their interim status. Brighton Landfill was unable to provide the financial responsibility and groundwater monitoring requirements needed to comply with the above amendment. Therefore, the owner/operator of the landfill stopped accepting hazardous waste just prior to the deadline. They continued taking non-hazardous solid waste until sometime before December 20, 1985. The 12/20/85 date was the date that Judge Joseph Koval signed a Circuit Court Order (81-CH-10) which required the landfill to cease accepting any solid waste.

At the time of the inspection it was noted that there was no landfilling activity occuring at the site. The front gate to the landfill was partly shut and there was a sign on the gate indicating that the site was closed.

In walking along the southern boundry of Site 2 (see site sketch), an erosion channel in the cover was observed. This channel began near an on-site road and continued south toward a township road drainage ditch. It appears that water runoff from the fill slope has created the small channel. Since the channel drains to the township road ditch, it appears that water runoff from the active portion flows off-site.

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Surface water coming off the southwest corner of Site 2 drains into an L-shaped trench. The trench was originally dug so that refuse could be disposed in it. This has not occurred. Instead it serves as a collection point for water run-off from the south and west sides of Site 2. Mr. Tickner said they had recently begun to backfill the trench. The soil being backfilled into the trench was said to be the same soil that was excavated from the trench. Most of the piles of soil located west of the trench were gone. The trench still appeared to be deep, even after being partially filled. Photos 4, 5, 6 and 7 show the L-shaped trench and ponded water. Mr. Tickner said they have been periodically pumping the ponded water out of the trench into an empty trench located north of Site 2. In the past they had pumped the water to a small impoundment along the south side of Site 2. From the impoundment, the water would flow out via a culvert to a township road-side ditch located south of the landfill. The water would eventually empty to a natural drainage system (a ravine) south of the road. Before water was pumped off-site an analysis would be taken to determine whether it exhibited a hazardous characteristic for metals using the extraction procedure. (Mr. Tickner said that the landfill's runoff hasn't yet proved to be hazardous.)

Surface water from the north fill face of Site 2 appears to drain to the empty trench located just north of it. Erosion channels along the trench's south side wall attest to the water that runs down into the excavation. The gap that had been in the trench's northeast wall has been backfilled with dirt. A metal culvert with a manual valve runs throughthe backfilled dirt. They can allow water to be released from the trench by opening the valve. The water would flow north toward the creek if it were discharged. Mr. Tickner said that they haven't allowed any water to leave the site from the culvert so far.

It appears water runoff from the northwest region of Site 1 would go either north or northwest.

As has been the case during previous inspections, the earthen berm at the northwest corner of the northwest region of Site 1 doesn't adequately contain runoff. The filled portion of the area comes right up to the top of the adjacent berm. Therefore, water runoff can flow right over the berm without being retained in the active portion. Just east of the berm is a wooded slope that leads down to the creek bed.

A low berm has been constructed along the top of the northern portion of Site 1. Another small berm has been placed near the toe of the northern fill face, along the old stream bed (a new creek bed has been constructed north of the old channel). These berms don't appear to have been constructed adequately enough to prevent surface water run-off from leaving the active portion of Site 1. One of the most obvious problems with the berms is that neither berm is continuous. The gaps could allow surface water to flow off the active portion.

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Areas of inadequate final cover were observed on both Site 1 and Site 2.

Scattered pieces of refuse could be observed along the north face of Site 2. South and above the fill face (along the highest elevation of fill at the landfill) were other areas of scattered refuse. It was noted that additional cover had been placed on the top of the fill but there were still areas where refuse could be found on the surface. The central and southern regions of Site 2 also had areas of inadequate final cover. An eroding fill face on the southwest corner of Site 2 revealed a small horizontal layer of partially covered refuse. Some of the waste had already fallen down the fill face and lay at the toe of the slope.

The largest area of inadequate final cover observed on Site 1 was located in the northwest region. This had been the area most recently landfilled at the site.

Mr. Tickner indicated that of the 28 monitoring wells installed around the landfill, 26 can be sampled. Apparently wells G110 and G102A have been destroyed. Monitor wells at the site were recently sampled by IEPA, and Ecology and Environment, a USEPA contractor.

It should be noted that the landfill is currently the subject of both a Compliance Order from the USEPA and a Circuit Court Order (81-CH-10). In the Court Order, the monitor wells are to be sealed by 6/18/86. The USEPA Compliance Order is requiring that a groundwater monitoring program be initiated at the site. Mr. Evans is hoping that the contrary requirements can be resolved. At the present time, he is not planning on removing the monitor wells.

Apparent violations of the Part 725 regulations of Title 35 Illinois Administrative Code (IAC) are indicated in the ISS inspection report and subsequent letter. The landfill apparently has not complied with the USEPA Compliance Order in that 1) they have not installed an artificial barrier surrounding the facility for access restriction and 2) they still appear to have runoff leaving the active area. The Compliance Section has the responsibility to determine whether the groundwater monitoring information required by the Order is adequate or not. Finally the landfill has apparent violations of the Part 807 regulations of Title 35 IAC. These include:

1. 807.302. They are required to have a vegetative screen along the south side of the landfill according to Special Condition 2 of Permit #1978-8-OP.
2. 807.305(c). Two feet of final cover is required within 60 days following the placement of refuse in the final lift.
3. 807.314(c). Fencing gates or other measures are required to control access to the site.

RCJ/js

cc: DLPC/FOS, Central Region

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ATTACHMENT A

1. !TT! delete last sentence and add
!At a minimum, the plan must specify:

1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to comply with paragraph (a) of this Section);

2) The test methods which will be used to test for these parameters;

3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

A) One of the sampling methods described in Appendix I of Part 721; or

B) An equivalent sampling method.

Comment: See Section 720.120(c) for related discussion.

4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;

5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply; and

6) Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Section 725.293, 725.325, 725.352, 725.373, 725.445, 725.475 and 725.502.

You are in apparent violation of 35 Ill. Adm. Code 725.113(b) because your waste analysis plan did not include the above information for the precipitation runoff collected at your facility. There is a presumption (see attached USEPA guidance dated April 10 and November 14, 1984) that runoff that has been in contact with hazardous waste, or in contact with leachate derived from hazardous waste, is hazardous until proven otherwise by analysis. Since this is considered a hazardous waste, it needs to be incorporated into the required information of the waste analysis plan. In addition, the Consent Agreement and Final Order of September 10, 1985 orders you to develop and follow a written waste analysis plan for collected runoff liquid.

2. !VV!

There was an area along the northern boundry of your site near the creek where the fence had been taken down.

3. !AAA! - delete last sentence and add -

At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

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You are in apparent violation of 35 Ill. Adm. Code 725.115(d) because not all the above information was included in your inspection log. Specifically, the time of the inspection was not written on the logs.

4. !TTT!

The contingency plan doesn't include the locations and capabilities of the earth moving equipment and telephones.

5. !VVV! delete last paragraph and add -

You are in apparent violation of 725.153(b) in that you had changed your primary Emergency Coordinator from Mr. Frank to Mr. Tickner but you haven't submitted revised contingency plans to local emergency response organizations informing them of the change.

6. !ZZZZZ!

You are not able to prevent precipitation runoff from leaving the active portions of your site. Therefore, you have not complied with 725.402(b).

7. !FFFF!

You have not submitted your closure plan to the Director at least 180 days prior to the expected closure date. The closure plan will be approved, modified, or disapproved by the Director within 90 days of its receipt, pursuant to 725.212(d).

8. !0000!

You have not submitted your post-closure plan to the Director at least 180 days before the expected date of closure.

9. Pursuant to 35 Ill. Adm. Code 725.410(a) at final closure of the landfill or upon closure of any cell, the owner or operator must cover the landfill or cell with a final cover designed and constructed to:

1) Provide long-term minimization of migration of liquids through the closed landfill;
2) Function with minimum maintenance;
3) Promote drainage and minimize erosion or abrasion of the cover;
4) Accomodate settling and subsidence so that the cover's integrity is maintained; and
5) Have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present.

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You are in apparent violation of 35 Ill. Adm. Code 725.410(a) for the following reason(s): You have not provided such a final cover to your landfill or cells upon closure.

RCJ/js

RECEIVED
JUL 14 1986
IEPA-DLPC